

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiffs,

v.

JIM BAUGH and
DAVID HARVILLE,

Defendants.

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) 20-CR-10263 (PBS/MBB)
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[~~PROPOSED~~] AMENDED PROTECTIVE ORDER

On good cause shown, it is hereby ORDERED that:

- (1) The discovery materials produced by the government in this case may be used by the defendants, defendants' counsel, and any employees or agents of defendants' counsel in the defense of this case, and for no other purpose and in connection with no other proceeding;
- (2) Except as specifically stated in this Paragraph (2), defendants and defendants' counsel will not disclose any materials produced by the government in the process of discovery and trial of this case, directly or indirectly, to any other person with the exception of those documents identified extracted and produced pursuant to the protocol set forth at Dkt. ____ in the civil case of *Steiner, et al. v. eBay, et al.*, No. 21-cv-11181-PBS, which shall not be subject to the Protective Order. This Order does not prohibit either defendant, his counsel, and those assisting the defense from sharing the materials for the purpose of preparing witnesses or the defense of this case;
- (3) The defendants and their counsel shall not copy or reproduce such discovery materials except as necessary to provide copies of the materials for use by an authorized person as described above to prepare or assist in the defense of this case,

and all such copies and reproductions will be treated in the same manner as the original materials;

- (4) When providing discovery materials to an authorized person, the defendants and their counsel must inform the authorized person that the materials are provided subject to the terms of this Protective Order and that the authorized person must comply with the terms of this Order;
- (5) Defendants' counsel will inform their respective clients of the provisions of this Protective Order, and direct each of them not to disclose or use any materials or information contained in the government's discovery in violation of this Order.

Nothing contained in this Protective Order will preclude any party from applying to the Court for further relief or for modification of any provision hereof.


HON. PATTI B. SARRIS

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Dated: August __, 2024